

## **EXHIBIT 3**

**In re MOTORS LIQUIDATION COMPANY, et al.,**  
**f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of**  
**Daniel H. Golden and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
14:14	14:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:11	15:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:19	15:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
15:25	16:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
17:10	17:14	
32:2	32:5	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:8	32:9	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:10	32:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
54:9	54:14	Irrelevant (FRE 401); calls for hearsay (FRE 802)
61:2	61:9	
61:10	61:13	
69:18	70:4	Objection to form vague and ambiguous (FRE 611(a))
70:7	70:8	
70:9	70:19	
72:23	73:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
73:15	73:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form compound (FRE 611(a))
73:22	74:10	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602);

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
		objection to form compound (FRE 611(a))
74:11	74:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:16	74:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:19	74:22	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
74:23	75:6	Lack of foundation (FRE 602): irrelevant (FRE 401)
75:7	75:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:21	75:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:22	75:25	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
76:1	76:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
78:11	78:15	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
78:17	78:24	Objection to form compound

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
		(611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
78:25	79:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:3	79:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:8	79:11	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
79:13	79:22	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
83:14	83:18	Lack of personal knowledge (FRE 602)
83:19	83:22	Lack of personal knowledge (FRE 602)
83:23	83:25	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:2	84:3	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:4	84:7	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
84:8	84:13	Irrelevant (FRE 401); lack of foundation, calls for expert opinion

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		(FRE 602, 701, 702); lack of personal knowledge (FRE 602)
84:15	84:17	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
91:2	91:16	Calls for hearsay (FRE 802)
91:17	91:19	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
91:22	91:23	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
107:1	107:14	
107:17	107:24	
110:1	110:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
110:5	110:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
111:20	112:1	Calls for hearsay (FRE 802)
112:2	112:7	Calls for hearsay (FRE 802)
130:13	130:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:19	130:20	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:21	130:23	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
133:14	133:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
133:19	133:19	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form confusing (FRE 611(a))
137:6	137:10	
137:13	137:13	
137:14	137:18	
141:18	142:3	Calls for hearsay (FRE 802)
146:6	146:15	
146:17	146:20	
151:11	151:15	

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
154:11	154:14	
154:15	154:19	Lack of foundation, calls for speculation (FRE 602)
154:20	154:20	
155:4	155:6	
160:4	160:25	
161:1	161:5	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
161:6	161:8	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
161:11	161:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
162:2	162:6	
163:2	163:5	
163:6	163:10	Calls for hearsay (FRE 802)
163:11	163:17	
163:18	163:24	
179:22	180:8	
180:9	180:23	
180:24	181:2	
181:3	181:6	
181:7	181:11	Calls for hearsay (FRE 802)
181:12	181:14	Calls for hearsay (FRE 802)
181:15	182:2	Lack of foundation, calls for speculation (FRE 602); Incomplete (FRE 106)
185:6	185:11	
185:12	186:1	Lack of foundation, calls for speculation (FRE 602)
188:11	188:13	
188:14	188:18	
191:7	191:17	
191:18	191:23	Lack of foundation, calls for speculation, calls for expert opinion (FRE 602, 701, 702)
202:23	203:8	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		(FRE 602, 701, 702)
203:9	203:9	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
203:11	203:12	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
207:8	207:11	
207:14	207:20	
207:21	208:13	Lack of foundation, calls for speculation, (FRE 602)
208:14	208:18	
208:20	208:21	
208:22	208:24	
209:14	209:17	Calls for hearsay (FRE 802)
210:6	210:6	Calls for hearsay (FRE 802)
210:7	210:9	Calls for hearsay (FRE 802)

**Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of Daniel H. Golden and the GUC Trust and New GM's Objections Thereto**

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
8:16	9:6	
11:15	11:21	
14:18	15:2	
15:8	15:9	
15:23	15:24	
18:14	19:7	
31:18	32:1	
32:6	32:7	
33:20	33:24	Hearsay (FRE 801/802/805));

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
		Outside the Scope of FRCP 32(a)(6)
34:5	36:11	Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
50:13	50:16	
50:19	51:11	
59:12	59:17	
59:24	60:5	
60:8	60:13	
60:17	60:19	
62:19	63:6	
70:5	70:6	
73:19	73:19	
73:21	73:21	
74:15	74:15	
75:19	75:20	
78:16	78:16	
79:12	79:12	
79:23	79:25	
80:8	80:17	
81:18	82:3	
84:1	84:1	
91:20	91:21	
107:25	108:14	
108:24	109:15	
110:3	110:4	
130:16	130:18	
133:18	133:18	
136:23	137:5	
137:11	137:11	
144:25	145:18	
145:21	146:5	
146:16	146:16	



Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
148:17	148:25	
149:3	149:9	
150:14	151:10	
154:21	154:24	
159:23	160:3	
161:9	161:10	
162:21	163:1	
182:3	182:3	
188:4	188:10	
191:24	192:2	
199:18	200:10	
203:1	203:1	
203:10	203:10	
207:12	207:13	
208:19	208:19	
209:18	210:5	